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Comment OPPOSED to RM-11306

Please strike down this petition in its entirety as the wrong approach to digital communications. As proposed, it reminds me of how they wanted to get rid of AM in amateur radio when SSB came in. The petition now shows us that they want to replace it all.

Simon & Garfunkel sang about the "Sounds of Silence", possibly because the pauses and quiet are the canvas upon which the art of speech is painted. In Amplitude Modulation mode the carrier acts as the canvas, the blank space upon which radio voices are painted. Single Side-Band is like paint sprayed into thin air. The paint (voice) must continue to spray else the fleeting illusion of space be lost. Any pause for breath can result in a cacophony of doubling.

Now add to that the raucous sound of digital that would be allowed to mix with voice communications if this petition was approved, and the irritation would drive everyone away and leave only the machines.

Where is a bandwidth measuring method in this proposal? AM, the mode I prefer, would be taken off the list of regular emission types in the proposed 3.5 kHz bandwidth segment, and treated as an exception to that rule. There is no reason to single out this mode, and apply to it a 9 kHz bandwidth that could raise concerns and undercut its use.

I am told that AM operators have an overwhelmingly spotless enforcement record with the FCC. They are the one group of operators with a technical interest in both good audio and signal quality. This proposal unfairly penalizes this law abiding group at a time others on SSB are drawing attention for overdriven amplifiers and buckshot interference this causes.

Digital operators are so few in number today that we do not know how their automated, machine operated stations will "behave." It would be very risky to turn loose the digital robots among established, human operators.

The digital group should be confined to a small space on a few bands to see if their systems will catch on as well as comply with rules against interference with others. This would be a development path that strikes a better balance.

AMers run one of the widest modes allowed on HF and voluntarily confine their activities to some of the smallest segments of the HF bands. This has been done, historically, as a goodwill gesture not always returned in kind by operators on SSB.

The point is that digital communications are supposed to offer better spectrum efficiency and utilization than today's analog modes, yet this proposal says nothing about a goodwill limitation by digital to avoid interference.

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